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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index Number 806]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.07d.iv.a [Index Number 806]. This ITAAC verified that for areas inside containment where spatial separation between Class 1E divisions and Non-Class 1E raceway distance is less than specified, an analysis has been performed and demonstrates that the Class 1E cables will still perform their design function.

The closure process for this ITAAC is based on the guidance described in NEI-08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52" which is endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

for Michael J. Yox

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 3.3.00.07d.iv.a [Index Number 806]

MJY/CMK/sfr

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Southern Nuclear Operating Company
ND-21-0853
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
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ITAAC Statement

Design Commitment

7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

Inspections, Tests, Analyses

Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class1E cables is consistent with the following:

iv) Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis

Acceptance Criteria

Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

iv.a) For areas inside containment, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.

ITAAC Determination Basis

Multiple ITAAC are performed to ensure that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables. In accordance with this ITAAC, separation distances for circuits that do not meet the criteria of ITAAC 3.3.00.07d.ii.a or ITAAC 3.3.00.07d.iii.a may be based on analyses. For circuits that have separation distances based on analyses, the subject ITAAC requires inspections to confirm that separation distances have been analyzed. The Class 1E cables and raceways and non-Class1 E cables inside containment are designed to be appropriately separated in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identify separation criteria consistent with the ITAAC commitment.

Class 1E electrical cables and raceways are required to be installed in accordance with design drawings installation specifications issued for construction and work package requirements. Completed raceway installation, in-progress and completed cable installation, and completed cable terminations are inspected to ensure the separation installation specifications are satisfied. Inspections are performed in accordance with the Construction Quality Verification Program 26139-000-4MP-T81C-N7101 (Reference 2). ITAAC 3.3.00.07d.ii.a [Index 800] will confirm that inspection records are completed to document the satisfactory separation between

raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables.

Cable Separation Report for Analyses (Reference 5) confirmed that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

For areas inside containment, separation distances less than those specified above (i.e. in the COL) and not provided with enclosed raceways or barriers have been analyzed. The analysis performed for this ITAAC is performed in accordance with standard IEEE 384-1981, and demonstrates that the effects of lesser separation for non-Class 1E fiber optic linear heat detection system cables within safety related cable trays in containment do not impact the ability of Class 1E circuits to perform their safety related functions (References 3 and 4).

Exceptions to the subject ITAAC are not included within the scope of this ITAAC and are addressed within the scope of ITAAC 3.3.00.07d.v.a [Index 809].

References 1 through 5 are available for NRC inspection, as well as the Unit 3 ITAAC 3.3.00.07d.iv.a Completion Package (Reference 6).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings and associated corrective actions. This review found no relevant ITAAC findings associated with this ITAAC.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.07d.iv.a was performed for VEGP Unit 3 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. APP-GW-E1-001, "Electrical Systems Design Criteria"
2. 26139-000-4MP-T81C-N7101, "Bechtel Construction Quality Verification Program"
3. APP-GW-E0R-006, "IEEE 384 Design Compliance Description"
4. APP-GW-GEF-850316, "Design Evaluations for Compliance with IEEE 384 Spatial Separation"
5. SV3-CSR-ITR-800806 Rev 0, "Unit 3 Cable Separation Report for Analyses"
6. 3.3.00.07d.iv.a-U3-CP-Rev0, "ITAAC Completion Package"